

CSD 1182 [01/10/08]

Name, Address, Telephone No. & I.D. No.

Christopher R. Bush, SBN 243471

Doan Law Firm LLP

4817 Palm Ave., Suite I

La Mesa, CA 91941

Phone (619) 462-4611 • Fax (619) 599-1651

cbush@doanlaw.com

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West "F" Street, San Diego, California 92101-6991

In Re

Andrew and Stephanie Pantoya

BANKRUPTCY NO. 09-13891-PB7

Tax ID /S.S.# XXX-XX-0635

/S.S.# XXX-XX-5201

Debtors.

NOTICE OF MOTION TO REDEEM

TO: U.S. Trustee, Chapter 7 Trustee, Wachovia Dealer Services

You are herewith served with the attached Motion by Andrew and Stephanie Pantoya

for: Motion to Redeem vehicle pursuant to 11 U.S.C. §722

and any accompanying declarations.

If you object to the Court granting the relief requested in the Motion:

1. **YOU ARE REQUIRED** to obtain a hearing date and time from the appropriate Courtroom Deputy for the judge assigned to this bankruptcy case. *If a Chapter 7, 11, or 12 case*, determine which deputy to call by looking at the Bankruptcy Case No. in the above caption of this notice. If the case number is followed by the letter:

-	JM	-	call (619) 557-6019	-	DEPARTMENT ONE (Room 218)
-	LA	-	call (619) 557-6594	-	DEPARTMENT TWO (Room 118)
-	LT	-	call (619) 557-6018	-	DEPARTMENT THREE (Room 129)
-	PB	-	call (619) 557-5157	-	DEPARTMENT FOUR (Room 328)

For ALL Chapter 13 cases, call (619) 557-5955.

2. **WITHIN FOURTEEN (14)¹ DAYS FROM THE DATE OF SERVICE OF THE MOTION**, you are further required to serve a copy of your DECLARATION IN OPPOSITION TO MOTION and separate REQUEST AND NOTICE OF HEARING [Local Form CSD 1184²] upon the undersigned moving party, together with any opposing papers. The

¹If you were served electronically or by mail, you have three (3) additional days to take the above-stated actions²You may obtain Local Form CSD 1184 from the office of the Clerk of the U.S. Bankruptcy Court

opposing declaration shall be signed and verified in the manner prescribed by Federal Rule of Bankruptcy Procedure 9011, and the declaration shall:

- a. identify the interest of the opposing party; and
- b. state, with particularity, the grounds for the opposition

3 **YOU MUST** file the original and one copy of the Declaration and Request and Notice of Hearing with proof of service with the Clerk of the U S. Bankruptcy Court at 325 West "F" Street, San Diego, California 92101-6991, no later than the next business day following the date of service

IF YOU FAIL TO SERVE YOUR "DECLARATION IN OPPOSITION TO INTENDED ACTION" AND "REQUEST AND NOTICE OF HEARING" within the 14-day¹ period provided by this notice, NO HEARING SHALL TAKE PLACE, you shall lose your opportunity for hearing, and the debtor or trustee may proceed to take the intended action.

DATED: 10/8/09

/s/ecf Christopher R. Bush

Attorney for Moving Party

CERTIFICATE OF SERVICE

I, the undersigned whose address appears below, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 8th day of October, I served a true copy of the within NOTICE OF MOTION TO REDEEM by US MAIL

on the following persons [set forth name and address of each person served] and/or as checked below:

[x] Chapter 7 Trustee:

James L Kennedy
P O. Box 28459
San Diego, CA 92198

Wachovia Dealer Services
P.O. Box 1697
Winterville, NC 28590

Lawyers Incorporating Service
Agent for Service of Process for
Wachovia Dealer Services, Inc.
2730 Gateway Oaks Dr Ste 100
Sacramento, CA 95833

[X] For Chpt 7 11 & 12 cases:

UNITED STATES TRUSTEE
Department of Justice
402 West Broadway, Suite 600
San Diego CA 92101

[] For ODD numbered Chapter 13 cases:

THOMAS H BILLINGSLEA JR TRUSTEE
530 "B" Street, Suite. 1500
San Diego CA 92101

[] For EVEN numbered Chapter 13 cases:

DAVID L. SKELTON TRUSTEE
525 'B' Street, Suite 1430
San Diego CA 92101-4507

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 10/8/09
(Date)

/s/ecf Ruben Maldonado
(Typed Name and Signature)

45 Third Ave. Suite 104
(Address)

Chula Vista, CA 91910
(City State ZIP Code)